

1 John M. Taladay (*pro hac vice*)
2 Evan J. Werbel (*pro hac vice*)
3 Thomas E. Carter (*pro hac vice*)
4 Andrew L. Lucarelli (*pro hac vice*)
5 BAKER BOTTS L.L.P.
6 700 K Street, N.W.
7 Washington, D.C. 20001
8 202.639.7700
9 202.639.7890 (fax)
10 Email: john.taladay@bakerbotts.com
11 evan.werbel@bakerbotts.com
12 tom.carter@bakerbotts.com
13 drew.lucarelli@bakerbotts.com

8 *Attorneys for Defendants Irico Group Corp. and*
9 *Irico Display Devices Co., Ltd.*

10
11
12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*
20
21
22

**DECLARATION OF WYATT M. CARLOCK
IN SUPPORT OF IRICO DEFENDANTS'
MOTION IN LIMINE #3 TO PRECLUDE
PLAINTIFFS FROM REFERRING TO
FOREIGN SHIPMENTS OF IRICO (USA)
INC.**

Judge: Honorable Jon S. Tigar

1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Motion in Limine #3 to Preclude Plaintiffs from Referring to Foreign Shipments
7 of Irico (USA) Inc. If called as a witness, I could and would testify to the matters set forth in this
8 declaration of my own personal knowledge.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of Irico (USA) Inc.’s Articles
10 of Incorporation organizing Irico (USA) Inc. under the General Corporation Law of California,
11 dated July 5, 1995.

12 3. Attached hereto as Exhibit 2 is a true and correct copy of Deposition Exhibit 8392,
13 which is a certified translation of a document produced by Irico in this litigation and bearing the
14 Bates label IRI-00003490-3497.

15 4. Attached hereto as Exhibit 3 is a true and correct copy of Deposition Exhibit 8404,
16 which is a certified translation of a document produced by Irico in this litigation and bearing the
17 Bates label IRI-CRT-00003568-3569.

18 5. Attached hereto as Exhibit 4 is a true and correct copy of Deposition Exhibit 8405,
19 which is a certified translation of a document produced by Irico in this litigation and bearing the
20 Bates label IRI-CRT-00003566-3567.

21 6. Attached hereto as Exhibit 5 is a true and correct copy of Deposition Exhibit 8406,
22 which is a certified translation of a document produced by Irico in this litigation and bearing the
23 Bates label IRI-CRT-00003570-3571.

24 7. Attached hereto as Exhibit 6 is a true and correct copy of Deposition Exhibit 8408,
25 which is a certified translation of a document produced by Irico in this litigation and bearing the
26 Bates label IRI-CRT-00003578-3579.

